

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

BREONA HORNE, <i>et al.</i> ,	§	
	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	
	§	CIVIL ACTION NO. 1:24-cv-00276-RP
BENELUX CORPORATION, d/b/a	§	
PALAZIO MEN’S CLUB, <i>et al.</i> ,	§	
	§	
<i>Defendants.</i>	§	

AGREED MOTION FOR ENTRY OF PROTECTIVE ORDER

Plaintiffs Breone Horne and Maggie Montes, and Defendants Benelux Corporation, d/b/a Palazzo Men’s Club, Anthanasios Stamatopoulos, and Michael Mealey (collectively, “Defendants”), respectfully move the Court for entry of the agreed Confidentiality and Protective Order, attached as Exhibit A.

The parties anticipate producing documents, or portions thereof, that contain confidential, sensitive, or proprietary business information in the course of the litigation. To facilitate the exchange of information, the parties have agreed to limit disclosure of certain confidential information as defined in the agreed Confidentiality and Protective Order.

The proposed Agreed Confidentiality and Protective Order is agreed to by all parties.

For these reasons, the parties respectfully ask the Court to enter the proposed Confidentiality and Protective Order attached as Exhibit A to this motion.

[signature blocks on next page]

Respectfully submitted,

/s/ Caitline Boehne *w/p

Ryan Estes
State Bar No. 24120586
Caitlin Boehne
State Bar No. 24075815
Kaplan Law Firm
2901 Bee Cave Road, Suite G
Austin, Texas (512) 814-7348
restes@kaplanlawatx.com
cboehne@kaplanlawatx.com
ATTORNEYS FOR PLAINTIFFS

/s/ William X. King

William X. King
State Bar No. 24072496
MCDOWELL HETHERINGTON LLP
1001 Fannin St., Ste. 2400
Houston, Texas 77002
Tel.: (713) 221-3840
Fax: (713) 337-8850
william.king@mhllp.com
ATTORNEY FOR DEFENDANTS

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document has been served on counsel of record in accordance with the Federal Rules of Civil Procedure via email and/or filing through the Court's ECF System on April 11, 2025.

/s/ William X. King
William X. King